EXHIBIT A

Page 1 of 6 Filed: 11/12/2015 Case: 45Cl1:15-cv-00283-c Document #: 1

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

REBECCA D. TILTON

VS.

NOV 12 2015

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, AIG LIFE INSURANCE COMPANY, and **CHARTIS INSURANCE**

DEFENDANTS

COMPLAINT

JURY TRIAL REQUESTED

COMES NOW, the Plaintiff, Rebecca D. Tilton, by and through counsel, and file this, her Complaint against the Defendants, National Union Fire Insurance Company of Pittsburgh, PA, AIG Life Insurance Company, and Chartis Insurance and in support thereof, would show and state the following:

- The Plaintiff, Rebecca D. Tilton, is an adult resident citizen of the State of 1. Mississippi, Madison County.
- The Defendant, National Union Fire Insurance Company of Pittsburgh, PA, 2. hereafter, "National Life," is a foreign corporation incorporated in New York with its principal place of business in New York, and is not duly licensed to do business in the State of Mississippi, and thus may be served with process of this Court by serving the Commissioner of Insurance for the State of Mississippi in the time and manner prescribed by law.
- The Defendant, AIG Life Insurance Company, hereafter, referred to as "AIG 3. Life" is a subsidiary of American International Group, Inc. (Commonly known as AIG) a foreign corporation incorporated in New Jersey with its principal place of business in New York, and is

Case: 45Cl1:15-cv-00283-c Document #: 1 Filed: 11/12/2015 Page 2 of 6 not duly licensed to do business in the State of Mississippi, and thus may be served with process of this Court by serving the Commissioner of Insurance for the State of Mississippi in the time and manner prescribed by law.

- 4. The Defendant, Chartis Insurance, hereafter, referred to as "Chartis" is a Subsidiary of American International Group, Inc. (Commonly known as AIG) a foreign corporation incorporated in New Jersey with its principal place of business in New York, and is not duly licensed to do business in the State of Mississippi, and thus may be served with process of this Court by serving the Commissioner of Insurance for the State of Mississippi in the time and manner prescribed by law.
 - 5. This Court has jurisdiction over the subject matter and parties hereto.
- 6. On or about November 13, 2012, John Tilton, Jr. departed this life in Hinds County, Mississippi; at the time of his death, the decedent maintained a fixed place of residence in Madison County, Mississippi.
- 7. John Tilton, Jr., the decedent, died in the crash of an airplane in which he was traveling, said crash occurring in Hinds County, Mississippi, on or about November 11, 2012. The causes of death were the direct result of the crash.
- 8. The said John Tilton, Jr., the decedent, was covered under the Southern Company Services, Inc. Group Life Insurance Policy ["Southern Company Policy"] issued by AIG Life Insurance Company, Chartis Insurance, and/or National Life, policy number PAI 8063708. It is verily believed that Chartis Insurance is an administrative unit of AIG Life Insurance Company responsible for administering the claims process of the Policy. Rebecca D. Tilton, Plaintiff herein has previously requested a copy of the life insurance policy in effect at the time of the decedent's death, but no policy has been furnished to Plaintiff; therefore, the Plaintiff is unable

Case: 45CI1:15-cv-00283-c Document #: 1 Filed: 11/12/2015 Page 3 of 6 to affix a copy of said policy as an exhibit to this complaint, but will request same from the Defendants with the discovery requests to be filed herein.

- 9. AIG Life Insurance Company, Chartis Insurance, and/or National Life, has refused to pay the life insurance benefits due and owing under the subject life insurance policy and this wrongful refusal constitutes a breach of contract, which has proximately damaged Plaintiff, entitling her to an award of damages against the Defendants, AIG Life Insurance Company, Chartis Insurance, and/or National Life.
- 10. AIG Life Insurance Company, Chartis Insurance, and/or National Life has refused to pay the life insurance benefits due and owing under the subject life insurance policy and this wrongful refusal constitutes a tortious breach of contract, which has proximately damaged Plaintiff, entitling her to an award of damages against the Defendants, AIG Life Insurance Company, Chartis Insurance, and/or National Life.
- 11. The referenced actions of the Defendants were wrongful, unjustified and so egregious as to justify an award to Plaintiff for actual damages, consequential damages, attorney's fees and expenses, all applicable interest at the proper rate, all costs of court, and any other damages to which Plaintiff may be entitled.
- 12. The referenced actions of the Defendants constitute a breach of the implied Covenant of good faith and fair dealing inherent in every contract, which said breach has proximately damaged Plaintiff, entitling her to an award of damages against the Defendants, AIG Life Insurance Company, Chartis Insurance, and/or National Life, including actual damages, consequential damages, attorney's fees and expenses, all applicable interest at the proper rate, all costs of court, and any other damages to which Plaintiff may be entitled.
 - 13. The Plaintiff also requests that this Court enter an order requiring the Defendants,

AIG Life Insurance Company, Chartis Insurance, and/or National Life, to specifically and fully perform the referenced contract of insurance and pay to the Plaintiff any and all benefits due thereunder, including all applicable interest at the proper rate, all costs of court, and any other damages to which Plaintiff may be entitled.

14. The Plaintiff requests such other and further relief as may be appropriate in the premises.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Rebecca D. Tilton demands judgment of and from the Defendants, AIG Life Insurance Company, Chartis Insurance, and/or National Union Fire Insurance Company of Pittsburgh, PA, for the damages and relief claimed and referenced above, plus all applicable interest at the proper rate, attorneys' fees and expenses, and all costs of court accruing herein, and for whatever else relief to which she may be entitled.

Respectfully submitted this the 6th day of November, 2015.

Rebecca D. Tilton, PLAINTIFF

Bv:

AL SHIYOU Of Counsel for Plaintiff

AL SHIYOU, MB# 6760 SHIYOU LAW FIRM P. O. BOX 310 HATTIESBURG, MS 39403-0310 PHONE (601) 583-6040 FAX (601) 583-6041 Attorneys for Plaintiff Case: 45Ci1:15-cv-00283-c Document #: 1 Filed: 11/12/2015 Page 5 of 6

SHIYOU LAW FIRM ATTORNEYS AND COUNSELORS AT LAW

AL SHIYOU

CANDANCE L. RICKMAN

November 6, 2015

Hon. Lee Westbrook Madison County Circuit Clerk Post Office Drawer 1626 Canton, Mississippi 39406

Re: Rebecca D. Tilton vs.

National Union Fire Insurance Company of Pittsburgh, PA, et al

Dear Mr. Westbrook:

Enclosed you will find an original and a copy of a *Complaint*, to be filed by your office, in the above referenced.

Please return the copy to my office stamped "FILED" indicating thereon the date same was received by your office. A pre-addressed, stamped envelope is included for your convenience.

Thanking you for your continued assistance, I am

Sincerely,

AL SHIYOU

AS/lkd Enclosure.

Filed: 11/12/2015 Page 6 of 6 FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi Madison County

Case # CI 2015	0283 Acct #	Paid By CHECK 9149	Rct# 71117
	CV CLERK'S FEE	85.00	
	CV LAW LIBRARY	2.50	
	CV COURT REPORTER TAX	10.00	
	CV COURT EDUCATION	2.00	
	CV COURT ADMINISTRATOR	2.00	
	CV CIVIL LEGAL ASSISTA	NCE FUND 5.00	
	CV COMPREHENSIVE ELECT	RONIC CT 10.00	
	CV JURY TAX	3.00	
	CV CONSTITUENTS FE	.50	
	CV RECORDS MANAGEMENT	PROGRAM 1.00	
	CV-JUDICIAL SYS OPERAT		

========= 161.00 Total

Payment received from AL SHIYOU

Transaction

3 I.D. DENDY 10:35 Drawer

Current Balance

Receipt Amount \$ 161.00

atbrook, Circuit Clerk

Case # CI 2015 0283

Acct # Paid By CHECK 9149 Rct# 71117

COVER SHEET Case: 45C 1:15- Civil Case Filing Form (To be completed by Attorney/Po	erty County# Judicial Co	case Year Case Year Junt ID Loci, co)	Docket Number age 1 10 10 10 Local Docket ID
Mississippi Supreme Court Fo	rm AOC/01 Month Date	Year	
Administrative Office of Courts	(Rey 2009) This area to be complete	ed by clerk Case	Number if filed prior to 1/1/94
in the CIRCUIT	Court of MADISON	County —	Judicial District
Origin of Suit (Place an "X" in one box o Initial Filing Reinste	ted Foreign Judgment Enro	olled Transfer from Other cou	ort Other
Plaintiff - Party(ies) Initially Bringing Sui	t Should Be Entered First - Enter Add	litional Plaintiffs on Separate Form	
Individual Tilton	Rebecca	Maiden Name, if applicabl	D. Jr/Sr/III/IV
Last Name Check (x) if Individual Plainitiff is	First Name acting in capacity as Executor(trix) or Add	ministrator(trix) of an Estate, and enter style:	
Carre			
Check (x) if Individual Planitiff is D/B/A or Agency	acting in capacity as Business Owner/Ope	erator (d/b/a) or State Agency, and enter entity	
Business		if Committee Indicate the state who	ve incornorated
Enter legal na Check (x) if Business Planitiff is f D/B/A	me of business, corporation, partnership, iling suit in the name of an entity other th	agency - If Corporation, indicate the state who an the above, and enter below:	se incorporated
	Ridgeland, MS 39157		
Attorney (Name & Address) Al Shiyou.	Shiyou kaw Firm, P. O. Box 310. I	lattiesburg, MS 39403	MS Bar No. <u>6760</u>
Check (x) if Individual Filing Intil	al Pleasing is NOT an attorney		
Signature of Individual Filing:			
Defendant - Name of Defendant - Ente	Additional Defendants on Separate	Form	
Individual		Samuel Consider	ile M.I. Jr/Sr/III/IV
Last Name	First Name		
Cast Name Check (x) If Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of			
X Check (v t if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:			
D/B/A or Agency National L	Inion Fire Insurance Co of Pittsbu	rgn, PA, et al	
Business	f had a competion partnership	o, agency - If Corporation, Indicate the state wh	ere incorporated
Enter legal n	is acting in the name of an entity other t	han the above, and enter below:	
0/8/A			
Attorney (Name & Address) - If Known			MS Bar No.
Damages Sought: Compensatory \$	Punitive \$	Check (x) if child support is	contemplated as an issue in this suit.*
		please submit completed Child Support Inform Children/Minors - Non-Domestic	Real Property
Nature of Suit (Place an "X" in one box	(only) Business/Commercial	Adoption - Contested	Adverse Possession
Domestic Relations Child Custody/Visitation	Accounting (Business)	Adoption - Uncontested	Ejectment Eminent Domain
Child Support	Business Dissolution	Consent to Abortion Minor Removal of Minority	Eviction
Contempt	Debt Collection	Other	Judicial Foreclosure
Divorce: Fault Divorce: Irreconcilable Oiff.	Employment Foreign Judgment	Civil Rights	Lien Assertion
Domestic Abuse	Garnishment	Elections	Partition
Emancipation	Replavin	Expungement	Tax Sale: Confirm/Cancel Title Boundary or Easement
Modification	Other	Habeas Corpus Post Conviction Relief/Prisoner	Other
Paternity	Probate Accounting (Probate)	Other	Torts
Property Division Separate Maintenance	Birth Certificate Correction	Contract	Bad Faith
Termination of Parental Rights	Commitment	X Breach of Contract	Fraud Loss of Consortium
UIFSA (eff 7/1/97; formerly URESA)	Conservatorship	Installment Contract	Malpractice - Legal
Other	Guardianship	Insurance Specific Performance	Malpractice - Medical
Appeals	Heirship Intestate Estate	Other	Mass Tort
Administrative Agency County Court	Minor's Settlement	Statutes/Rules	Negligence · General
Hardship Petition (Driver Ucense)	Muniment of Title	Bond Validation	Negligence - Motor Vehicle Product Liability
Justice Court	Name Change	Civil Forfeiture Declaratory Judgment	Subrogation
MS Dept Employment Security	Testate Estate	Injunction or Restraining Order	Wrongful Death
Worker's Compensation	Will Contest Other	Other	Other

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

REBECCA D. TILTON

PLAINTIFF

VERSUS

CAUSE NO: CI 2015-283-JC

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, AIG INSURANCE COMPANY and CHARTIS INSURANCE

DEFENDANT

PROOF OF SERVICE

SUMMONS

THE STATE OF MISSISSIPPI

TO: AIG Life Insurance Company % MS Insurance Department 501 North West Street Jackson, MS 39201

NOTICE TO DEFENDANT THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to AL SHIYOU, P.O. Box 310, Hattiesburg, MS 39403, the attorney for the Plaintiff. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a Judgment by Default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original or your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this day of November, 2015.

MADISON COUNTY CIRCUIT CLERK

(SEAL)

BY: _____, D.C.

AL SHIYOU SHIYOU LAW FIRM MSB #6760 P. O. BOX 310 HATTIESBURG, MS 39403 (601) 583-6040 Case: 45CI1:15-cv-00283-c Document #: 3 Filed: 11/20/2015 Page 1 of 1 SUMMONS (PROCESS SERVER)

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

REBECCA D. TILTON

PLAINTIFF

VERSUS

CAUSE NO: CI 2015-283-JC

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, AIG INSURANCE COMPANY and CHARTIS INSURANCE

DEFENDANT

PROOF OF SERVICE

SUMMONS

THE STATE OF MISSISSIPPI

TO: Chartis Insurance
% MS Insurance Department
501 North West Street
Jackson, MS 39201

NOTICE TO DEFENDANT THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to AL SHIYOU, P.O. Box 310, Hattiesburg, MS 39403, the attorney for the Plaintiff. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a Judgment by Default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original or your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this day of November, 2015.

MADISON COUNTY CIRCUIT CLERK

(SEAL)

BY: _____, D.C.

AL SHIYOU SHIYOU LAW FIRM MSB #6760 P. O. BOX 310 HATTIESBURG, MS 39403 (601) 583-6040

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

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PLAINTIFF

VERSUS

CAUSE NO: CI 2015-283-JC

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, AIG INSURANCE COMPANY and CHARTIS INSURANCE

DEFENDANT

PROOF OF SEI	RVICE
<u> </u>	•
SUMMON	S

THE STATE OF MISSISSIPPI

TO: National Union Fire Insurance Company of Pittsburgh, PA
 MS Insurance Department
 501 North West Street
 Jackson, MS 39201

NOTICE TO DEFENDANT THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to AL SHIYOU, P.O. Box 310, Hattiesburg, MS 39403, the attorney for the Plaintiff. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a Judgment by Default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original or your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this _____ day of November, 2015.

MADISON COUNTY CIRCUIT CLERK

(SEAL)

BY: _____, D.C.

AL SHIYOU SHIYOU LAW FIRM MSB #6760 P. O. BOX 310 HATTIESBURG, MS 39403 (601) 583-6040 Case: 45Cl1:15-cv-00283-c Document#: 4 Filed: 11/20/2015 Page 2 of 2

SHIYOU LAW FIRM ATTORNEYS AND COUNSELORS AT LAW

AL SHIYOU

CANDANCE L. RICKMAN

November 16, 2015

Hon. Lee Westbrook Madison County Circuit Clerk Post Office Drawer 1626 Canton, Mississippi 39406

Re:

Rebecca D. Tilton vs.

National Union Fire Insurance Company of Pittsburgh, PA, et al

Cause No: CI 2015-283-JC

Dear Mr. Westbrook:

Enclosed you will find an original and two (2) copies of three (3) separate Rule 4 Summons, to be issued by your office, in the above referenced.

Please return the copies to my office stamped "ISSUED" indicating thereon the date same was received by your office. A pre-addressed, stamped envelope is included for your convenience.

Thanking you for your continued assistance, I am

Sincerely.

AL SHIYOU

AS/Ikd Enclosure.

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

NOV 20 2015

PLAINTIFF(S)

LEE WESTBROOK CIRCUIT CLERK

YS.

CIVILACTIONNOCI-2015-0283-5C

tral Maior Fire As. Co.

DEFENDANT(S)

ORDER REGARDING MOTION HEARINGS AND BRIEFING

THIS CAUSE is before the Court sua sponte in relation to motion hearings and briefing, and the Court finds that pursuant to M.R.C.P. 78 all motions, except at the Court's discretion, should be determined without oral argument upon brief written statements of reasons in support and opposition, but the moving party should be required to notice all motions for hearing on a date after the memorandum and briefing will have been completed, and counsel should be required to appear on that date and be prepared to make oral argument.

The Court further finds that the responding party should be placed on notice that the failure to timely respond the motion may result in the motion being granted prior to the date the motion has been noticed for hearing.

The Court further finds that after having previously experienced problems with parties either not filing, or not timely filing memorandum or briefs, the result of which adversely impacted the Court's docket, the parties should be required to timely file memorandum or briefs as ordered herein.

The Court further finds that the parties should be required to file any affidavit supporting a

258/480

Case: 45Cl1:15-cv-00283-c Document #: 5 Filed: 11/20/2015 Page 2 of 3 motion with the motion and any opposing affidavit with the related reply or rebuttal.

The Court further finds that with respect to motions to dismiss or for summary judgment the parties should be required to comply with the memorandum or briefing schedule set forth in URCCC 4.03 2., as modified by the Administrative Procedures for Mississippi Electronic Courts Section 3.

A. 1. The Court further finds that the parties should be required to set forth in a separate pleading or distinctly set forth in the motion the itemization of the facts relied upon and not genuinely disputed.

The Court further finds that with respect to all other motions, except motions for a default judgment, the parties should be required to comply with the encouraged memorandum or briefing schedule set forth in the second paragraph of URCCC 4.03 3., as modified by the Administrative Procedures for Mississippi Electronic Courts Section 3. A. 1.

IT IS THEREFORE ORDERED AND ADJUDGED that all motions, except at the Court's discretion, shall be determined without oral argument upon brief written statements of reasons in support and opposition.

IT IS FURTHER ORDERED AND ADJUDGED that the parties shall be and hereby required to file any affidavit supporting a motion with the motion and any opposing affidavit with the related reply or rebutfal.

IT IS FURTHER ORDERED AND ADJUDGED that with respect to motions to dismiss or for summary judgment the parties shall be and hereby are required to comply with the memorandum or briefing schedule set forth in URCCC 4.03 2., as modified by the Administrative Procedures for Mississippi Electronic Courts Section 3. A. 1., and the parties shall be and hereby are required to set forth in a separate pleading or distinctly set forth in the motion the itemization of the facts relied upon and not genuinely disputed.

Filed: 11/20/2015 Page 3 of 3 Case: 45CI1:15-cv-00283-c Document #: 5

IT IS FURTHER ORDERED AND ADJUDGED that with respect to all other motions, except motions for a default judgment, the parties shall be and hereby are required to file memoranda or briefs on the schedule set forth in the second paragraph of URCCC 4.03 3., as modified by the Administrative Procedures for Mississippi Electronic Courts Section 3, A. 1,

IT IS FURTHER ORDERED AND ADJUDGED that, notwithstanding the above finding and ruling that all motions, except at the Court's discretion, should be determined without oral argument upon brief written statements of reasons in support and opposition, the moving party shall be and hereby is required to notice all motions for hearing on a date after the memorandum and briefing will have been completed, and counsel shall be and hereby are required to appear and be prepared to make oral argument.

IT IS FURTHER ORDERED AND ADJUDGED that the responding party shall be and hereby is placed on notice that the failure to timely respond the motion may result in the motion being granted prior to the date the motion has been noticed for hearing.

IT IS FURTHER ORDERED AND ADJUDGED that, in addition to filing a notice of hearing on MEC, the parties shall be and hereby are required to email a copy thereof to the Court Administrator at pat.green@madison-co.com. SO ORDERED AND ADJUDGED this day of Willember , 20 15

CIRCUIT JUDGE

Case: 45Cl1:15-cv-00283-c

Docume

Filed: 12/02/2015 Page 1 of 1

MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

MARK HAIRE Deputy Commissioner of Insurance

RICKY DAVIB State Chief Deputy Fire Marshal MISSISSIPPI INSURANCE DEPARTMENT. D

501 N. WEST STREET, SUITE 10:
WOOLFOLK BUILDING
JACKSON, MISSISSIPPI 3 201
www.mld.ms.gov

November 30, 201

DEC 02 2015

LEE WESTBROOK CIRCUIT CLERK MAILING ADDRESS Post Office Box 79 Inckson, Mississippi 39205-0078 FELEPHONE: (601) 359-3569 FAX: (601) 359-2474

CERTIFIED MAIL RETURN RECEIPT REQUESTED 91 7199 9991 7031 3205 1406

National Union Fire Insurance Company of Pittsburgh, PA C/O United States Corporation Company 506 South President Street Jackson, MS 39201

In Re: Civil Action No: CI15-0208

Rebecca Tilton vs. National Union Fire Insurance Company of Pittsburgh, PA, AIG Insurance Company and Chartis Insurance, in the Circuit Court of Madison County, Mississippi

Dear Sir/Madam:

Please find enclosed copy of summons, complaint, and accompanying pleadings, if any, in the above-styled cause, which have was served on the Commissioner of Insurance at 1:36 p.m. on November 30, 2015.

Sincerely

MIKE CHANEY COMMISSIONER OF INSURANCE,

Mary Ellen Dillard

Secretary to Commissioner and

Legal Process Clerk

MC/med Enclosures

Pc: Honorable Lee Westbrook

Case: 45Cl1:15-cv-00283-c

Document Filed: 12/07/2015

(PROCESS SERVER)

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

REBECCA D. TILTON

PLAINTIFF

Page 1 of 2

VERSUS

CAUSE NO: CI 2015-283-JC

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, AIG INSURANCE COMPANY and CHARTIS INSURANCE

DEFENDANT

PROOF OF SERVICE

SUMMONS

THE STATE OF MISSISSIPPI

TO: Chartis Insurance

% MS Insurance Department 501 North West Street Jackson, MS 39201

NOTICE TO DEFENDANT THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to AL SHIYOU, P.O. Box 310, Hattiesburg, MS 39403, the attorney for the Plaintiff. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a Judgment by Default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original or your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court this

day of November, 2015

MADISON COUNTY CIRCUIT CLERK

(SEAL)

RV.

.. D.C.

AL SHIYOU SHIYOU LAW FIR

MSB #6760 P. O. BOX 310

HATTIESBURG, MS 39403

(601) 583-6040

Case: 45Cl1:15-cv-00283-c Document #: 7 Filed: 12/07/2015 Page 2 of 2 (PROCESS SERVER)
Name of Person or Entity Served
Addition of Lordon of Entary Burros
I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):
FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope postage prepaid, addressed to the sender (Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B). PERSONAL SERVICE. I personally delivered copies to Charlis Lis. John County of the State of Miss. Sipp. RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said regreen within County. (state). I served the Summons and
copies to said person within County, (state). I served the Summons and Complaint on the day of, 2015, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with who is the (here insert wife, husband, son, daughter or other person as the case may be), a
member of the family of the person served above the age of sixteen years and willing to receive the Summons and Complaint, and thereafter on the day of, 2015, I mailed (by first class mail, postage prepaid) copies to the person served at his or her delivery to the person served at his or her usual place of abode where the copies were left. CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or other evidence of actual delivery to the person served.) At the time of service I was at least 18 years of age and not a party to this action.
Fee for service: \$ 45.00
Process service must list below: (Please print or type) Name Social Security No. XXX-XXXX Social Security No.
Address 10.0. 150 x 546 R. dg C. Mad, 1915 3915 & Telephone No. 6-0/-5-40-3591
STATE OF MISSISSIPPI COUNTY OF KANKIA Personally appeared before my the undersigned authority in and for the state and county aforesaid, the within named Maril Marson who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service - Summons" are true and correct as therein stated.
Sterill Pearson Process Server signature
Sworn to and subscribed Belief me this the 3 day of Decambor 2015. (SEAL) My Commission Expires: April 24, 2016